

**To:** Hupp, Sydney[hupp.sydney@epa.gov]  
**Cc:** Hupp, Millan[hupp.millan@epa.gov]; Dickerson, Aaron[dickerson.aaron@epa.gov]; Ferguson, Lincoln[ferguson.lincoln@epa.gov]; Dravis, Samantha[dravis.samantha@epa.gov]; Keith, Jennie[Keith.Jennie@epa.gov]  
**From:** Fugh, Justina  
**Sent:** Fri 3/17/2017 6:58:41 PM  
**Subject:** RE: API Board meeting invitation for Administrator Pruitt 22 March

I haven't heard back from Khary Cauthen yet about that reception.

**From:** Hupp, Sydney  
**Sent:** Friday, March 17, 2017 2:56 PM  
**To:** Fugh, Justina <Fugh.Justina@epa.gov>  
**Cc:** Hupp, Millan <hupp.millan@epa.gov>; Dickerson, Aaron <dickerson.aaron@epa.gov>; Ferguson, Lincoln <ferguson.lincoln@epa.gov>; Dravis, Samantha <dravis.samantha@epa.gov>; Keith, Jennie <Keith.Jennie@epa.gov>  
**Subject:** RE: API Board meeting invitation for Administrator Pruitt 22 March

Samantha, did you let them know we would be attending? The Administrator may be running a little behind to make it to the dinner at 6:30.

**From:** Fugh, Justina  
**Sent:** Thursday, March 16, 2017 2:36 PM  
**To:** Hupp, Sydney <hupp.sydney@epa.gov>  
**Cc:** Hupp, Millan <hupp.millan@epa.gov>; Dickerson, Aaron <dickerson.aaron@epa.gov>; Ferguson, Lincoln <ferguson.lincoln@epa.gov>; Dravis, Samantha <dravis.samantha@epa.gov>; Keith, Jennie <Keith.Jennie@epa.gov>  
**Subject:** FW: API Board meeting invitation for Administrator Pruitt 22 March

Hi,

The American Petroleum Institute (API) has invited the Administrator to speak to their Executive Committee and Board of Directors at their dinner meeting in Washington, DC. They have also invited him to the reception that precedes the dinner. We've already addressed two other invitations, and the answer to this one will show why we love it when you ask OGC/Ethics in advance!

API is a federally registered lobbyist, so the Administrator cannot accept any gift from them. But he can speak to them and, if the event at which he is speaking is a dinner, he can also eat the meal. *See* 5 CFR 2635.203(b)(8) of the recently effective new gift rules. And under this exclusion, Millan may also attend and eat the meal.

But that reception is a bit of a tougher issue. He's not actually speaking at the reception, so then we have to figure out whether the reception is an integral part of the dinner at which he is speaking. If so, then we can clear him to attend the reception too. Do you know whether he wants to attend the reception or just the dinner? In any case, I have put a call into Khary Cauthen (who used to work at EPA) to ask him whether that reception is part of the whole event. If it is, then we can clear the Administrator to attend both.

Whatever I hear back, I'll circle back with you to confirm. But for now, he can at least attend the dinner, speak, and eat the meal.

Cheers,  
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308  
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the  
zip code) | phone 202-564-1786 | fax 202-564-1772

**From:** Hupp, Sydney  
**Sent:** Thursday, March 16, 2017 12:56 PM  
**To:** Fugh, Justina <[Fugh.Justina@epa.gov](mailto:Fugh.Justina@epa.gov)>; **Cc:** Dravis, Samantha <[dravis.samantha@epa.gov](mailto:dravis.samantha@epa.gov)>  
**Subject:** FW: API Board meeting invitation for Administrator Pruitt 22 March

Hello all—

Justina, will you please vet this from the ethics side?

Millan, will you please forward over the event request sheet and intro yourself as point of contact (since this is next week).

Aaron, will you please add this to the spreadsheet as a yes?

Lincoln, just want you to be aware that this speaking engagement is coming down the pipeline.

Thank you all!

Sydney

**From:** Dravis, Samantha

**Sent:** Wednesday, March 15, 2017 11:44 AM

**To:** Hale, Michelle <[hale.michelle@epa.gov](mailto:hale.michelle@epa.gov)>; Hupp, Sydney <[hupp.sydney@epa.gov](mailto:hupp.sydney@epa.gov)>; Hupp, Millan <[hupp.millan@epa.gov](mailto:hupp.millan@epa.gov)>

**Subject:** FW: API Board meeting invitation for Administrator Pruitt 22 March

I spoke to Administrator Pruitt and he wants to do this one. Could we calendar this, por favor?

Attendees will be myself and Ryan Jackson if he wants to.

We'll also need to check with Justina in ethics on the meals offered. API will tell us how much they cost so that we can reimburse.

**From:** Khary Cauthen [<mailto:cauthenk@api.org>]  
**Sent:** Tuesday, March 14, 2017 3:17 PM  
**To:** Jackson, Ryan <[jackson.ryan@epa.gov](mailto:jackson.ryan@epa.gov)>; Dravis, Samantha <[dravis.samantha@epa.gov](mailto:dravis.samantha@epa.gov)>  
**Subject:** API Board meeting invitation for Administrator Pruitt 22 March

Ryan/Samantha: Good afternoon, hope that all is well with you two. Jack would like to invite Administrator Pruitt to our Board Dinner next Wednesday evening. Luckily our Board is meeting just across the street from your offices. We would love for the Administrator to attend part or all of the reception and dinner and I've attached the attendees of this year's Board Meeting Dinner. We have great attendance for this meeting as it is the first Washington DC API meeting of the new Administration/Congress.

Please do not hesitate to reach out with any questions.

Khary Cauthen

202-682-8209 o

**Ex. 6 - Personal Privacy**